



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

ORIGINAL

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

MAR 04 2015

Richard Fleege  
Environmental Manager  
Sonneborn Inc.  
100 Sonneborn Lane  
Petrolia, PA 16050

**Re: SPCC case number SPCC-PA-2013-00077**  
**Section 308 Information Request**

Dear Mr. Fleege:

The purpose of this letter is to determine whether Sonneborn Inc. is in compliance with the Spill Prevention, Control and Countermeasures (SPCC) Regulations found at Title 40 C.F.R. Part 112. The U.S. Environmental Protection Agency (EPA) is currently reviewing the SPCC plan for your facility located at 100 Sonneborn Lane, Petrolia, PA 16050 (Facility). In order to determine whether your Facility is in compliance, you or other authorized Facility representative is hereby required to submit to EPA the information requested herein pursuant to Section 308(a) of the Clean Water Act, 33 U.S.C. § 1318(a).

1. Describe your Facility's current operations.

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2. Is your Facility considered a production facility under the definition provided in Title 40 C.F.R. Part 112?

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3. Provide the North American Industry Classification System (NAICS) code and Standard Industrial Classification code for your Facility.

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4. Does your Facility have tank battery, separation, and treating areas?

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5. Does your Facility have flow-through process vessels?

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6. Does your Facility have produced water containers?

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7. Does your Facility have flowlines and/or intra-facility gathering lines?

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8. Does your Facility have a saltwater (oil field brine) disposal facility?

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9. Describe the use of the wells that appear on your Facility diagram.

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Please certify the above information in the following manner:

I hereby certify the above to be true and accurate to the best of my knowledge.

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Name (please print or type): \_\_\_\_\_

Title: \_\_\_\_\_

Telephone Number: \_\_\_\_\_

If you or other authorized Facility representative fail to properly respond to this request, you or other authorized Facility representative may be subject to the following penalties. Pursuant to Section 309(g) of the Act, 33 U.S.C. § 1319(g), any person who violates Section 308 of the Act is subject to administrative penalties. Pursuant to Section 309(d) of the Act, 33 U.S.C. § 1319(d), any person who violates Section 308 of the Act is subject to a civil penalty of up to \$37,500 per day of violation. In addition, pursuant to Section 309 (c)(1) of the Act, 33 U.S.C. § 1319(C)(1), any person who negligently violates Section 308 of the Act may be punished by a fine of not less than \$2,500 nor more than \$25,000 per day of violation, or by imprisonment for not more than 1 year, or by both.

In addition, providing false, fictitious or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. § 1001. The information you provide may be used by EPA in administrative, civil, or criminal proceedings.

Your response should be submitted within **thirty (30) days** of your receipt of this letter to:

**U.S. ENVIRONMENTAL PROTECTION AGENCY  
REGION III, RACHEL SIMKINS  
OIL AND PREVENTION BRANCH (3HS61)  
1650 ARCH STREET  
PHILADELPHIA, PA 19103-2029**

Enclosed for your review and information is a copy of the Oil Pollution Prevention Outreach Material CD, dated March 2014, as prepared by EPA, Region III. This CD includes applicable regulations; 40 C.F.R. Part 109, 40 C.F.R. Part 110, 40 C.F.R. Part 112, and 33 C.F.R. §§ 153.201, 153.203, 153.205; in addition to Region III's SPCC and Facility Response Plan (FRP) Information Guides. For the most recent information concerning the Oil Pollution Prevention Regulations, including the SPCC Guidance for Regional Inspectors, please consult the National EPA Oil Program website at: <http://www.epa.gov/oilspill>.

This information request is not subject to review by the Director of OMB pursuant to the requirements of the Paperwork Reduction Act, 44 U.S.C. § 3507.

If you have any questions on this matter, you may call Rachel Simkins at (215) 814-3277.

Sincerely,



Joan Armstrong, Associate Director  
Office of Enforcement  
Hazardous Site Cleanup Division

